DOCKET NO: ***01-AFC-24*** DOCKET REQUEST

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STATE OF CALIFORNIA
State Energy Resources
Conservation and Development Commission

In the matter of:	)	
	)	DOCKET NO: ***01-AFC-24***
	)	
Palomar Energy, LLC	)	DATA REQUEST
Application for Certification of	)	of **Bill Powers, P.E.**
Palomar Energy Power Plant	)	SET **Three**
	)	

TO: ***Stephen Baum, CEO of Sempra Energy, and his Attorney***.

Bill Powers, P.E. requests that you answer the following data request within ***10*** days. All the information sought is relevant to the proceeding and is in the control of the applicant and not readily available from other sources. In answering this data request, you are required to furnish full and complete answers.

Describe in detail the chemical dosing protocol, include all chemicals and dosage rates, that will be followed to minimize the propagation of Legionella bacteria in the Palomar Energy Project wet cooling towers. No mention of the expected presence of Legionella bacteria in the cooling towers is provided in the AFC, although the Cooling Technology Institute (CTI) advises that it should be assumed that any cooling tower system harbors the bacteria. 4,000 people die in the US each year from Legionnaire's Disease caused by the Legionella bacteria. See the attached February 2000 CTI paper, "Legionellosis, Guideline Best Practices for Control of Legionella." The CTI paper is explicit that, "since no fixed danger level can be assigned, it also follows that no specific level of the organism can be assigned as safe." CTI has developed rigorous chemical dosing guidelines designed to minimize (though not eliminate) the propagation of the Legionella bacteria in cooling towers. Cooling tower drift, in the from of easily inhaled aerosols, is the exposure pathway. This issue is especially significant if a new power plant is being located near existing residential areas, as is the case of the Palomar Energy Project. This information is necessary to confirm that the project proponent is: 1) aware of the potential danger of Legionella bacteria, and 2) has an effective chemical dosing plan to address the problem.

September 16, 2002
Date

Signature

[X] Check box if continuation pages are attached.